

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)

(stephen.karotkin@weil.com)

Ray C. Schrock, P.C. (*pro hac vice*)

(ray.schrock@weil.com)

Jessica Liou (*pro hac vice*)

(jessica.liou@weil.com)

Matthew Goren (*pro hac vice*)

(matthew.goren@weil.com)

767 Fifth Avenue

New York, NY 10153-0119

Tel: 212 310 8000

Fax: 212 310 8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)

(tkeller@kellerbenvenutti.com)

Jane Kim (#298192)

(jkim@kellerbenvenutti.com)

650 California Street, Suite 1900

San Francisco, CA 94108

Tel: 415 496 6723

Fax: 650 636 9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company

☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case) (Jointly Administered)

**DEBTORS' REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF DEBTORS' OBJECTION TO CLASS
REPRESENTATIVE'S MOTION TO EXTEND
APPLICATION OF FEDERAL RULE OF CIVIL
PROCEDURE 23 TO PROOF OF CLAIM**

Date: January 29, 2020

Time: 10:00 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), by and through its attorneys, hereby requests the Court to take judicial notice pursuant to Federal Rule of Evidence 201, as made applicable to this adversary proceeding by Bankruptcy Rule 9017, of the following facts:

1. Attached as **Exhibit A** hereto is a true and correct copy of the *Amended Stipulation and Order to Consolidate and File Third Amended Consolidated Class Action Complaint* filed in *In re PG&E Corporation Securities Litigation*, Case No. 18-03509 (N.D. Cal.) (the “**Securities Litigation**”) on May 7, 2019 [Dkt. No. 117].

2. Attached as **Exhibit B** hereto is a true and correct copy of the *Third Amended Consolidated Class Action Complaint* filed on May 28, 2019 in the Securities Litigation [Dkt. No. 121].

3. Attached as **Exhibit C** hereto is a true and correct copy of the *Order Denying Motion for Preliminary Injunction* filed in *PG&E Corp. v. Public Employees Retirement Association of New Mexico (PERA)*, Adv. Pro. No. 19-03039 (Bankr. N.D. Cal.) (the “**PERA Adversary Proceeding**”) on August 28, 2019 [Dkt. No. 23].

4. Attached as **Exhibit D** hereto is a true and correct copy of the *Stipulation and Agreement for Order Regarding Scheduling Only as to Public Employees Retirement Association of New Mexico* filed in *PG&E Corp. v. PERA et al.*, Adv. Pro. No. 19-03006 (Bankr. N.D. Cal.) (the “**Non-Debtor Defendants Adversary Proceeding**”) on April 3, 2019 [Dkt. No. 34].

5. Attached as **Exhibit E** hereto is a true and correct copy of the *Stipulated Order Regarding Scheduling Only as to Public Employees Retirement Association of New Mexico* filed in the Non-Debtor Defendants Adversary Proceeding on April 5, 2019 [Dkt. No. 37].

6. Attached as **Exhibit F** hereto is a true and correct copy of the *Stipulation and Agreement for Order Between Debtors and the Public Employees Retirement Association of New Mexico* filed in the Non-Debtor Defendants Adversary Proceeding on May 1, 2019 [Dkt. No. 42].

7. Attached as **Exhibit G** hereto is a true and correct copy of the *Order Granting Stipulation Between Debtors and the Public Employees Retirement Association of New Mexico* filed in the Non-Debtor Defendants Adversary Proceeding on May 2, 2019 [Dkt. No. 44].

8. Attached as **Exhibit H** hereto is a true and correct copy of the *Debtors' Complaint for Preliminary and Permanent Injunctive Relief as to In re PG&E Corp. Securities Litig., 18-CV-03509 (N.D. Cal.)* filed in the PERA Adversary Proceeding on June 18, 2019 [Dkt. No. 1].

9. Attached as **Exhibit I** hereto is a true and correct copy of the *Debtors' Motion for a Preliminary Injunction as to In re PG&E Corp. Securities Litig., 18-CV-035059 (N.D. Cal.) and Memorandum of Points and Authorities in Support* filed in the PERA Adversary Proceeding on June 18, 2019 [Dkt. No. 2].

10. Attached as **Exhibit J** hereto is a true and correct copy of the *Declaration of Elizabeth Collier in Support of Debtors' Motion for a Preliminary Injunction as to In re PG&E Corp. Securities Litig., 18-CV-03509 (N.D. Cal.)* filed in the PERA Adversary Proceeding on June 18, 2019 [Dkt. No. 3].

11. Attached as **Exhibit K** hereto is a true and correct copy of the *Securities Lead Plaintiff's Memorandum of Points and Authorities in Opposition to Debtors' Motion for Preliminary Injunction as to In re PG&E Corp. Securities Litig., 18-CV-03509 (N.D. Cal.)* filed in the PERA Adversary Proceeding on June 18, 2019 [Dkt. No. 12].

WEIL, GOTSHAL & MANGES LLP

KELLER & BENVENUTTI LLP

By: /s/ Richard W. Slack
Richard W. Slack

*Attorneys for Debtors
and Debtors in Possession*